

## REMARKS

Claims 2-25, 27-57, and 72 were pending in this application when the present Office Action was mailed (February 21, 2006). In this paper, no claims have been amended or added. Accordingly, claims 2-25, 27-57, and 72 are currently pending.

In the February 21, 2006 Office Action, all the pending claims were allowed except claim 11. More specifically, the status of the application in light of this Office Action is as follows:

- (A) Claims 2-10, 12-25, 27-57, and 72 are allowed; and
- (B) Claim 11 stands rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Publication No. 2002/0108861 to Emesh et al. ("Emesh").

### A. Response to the Indication of Allowable Subject Matter

The undersigned attorney wishes to thank the Examiner for his indication that claims 2-10, 12-25, 27-57, and 72 are allowed. None of these claims have been amended in this response.

### B. Response to the Section 102(b) Rejection

Claim 11 was rejected under 35 U.S.C. § 102(b) as being anticipated by Emesh. Applicants respectfully traverse this rejection. For the reasons discussed below, claim 11 is patentable over Emesh, and thus the Section 102(b) rejection of claim 11 should be withdrawn.

Claim 11 is directed toward a method for removing material from a microelectronic substrate. The method includes disposing an electrolytic liquid between an electrically conductive material of the microelectronic substrate and at least one electrode. The electrolytic liquid has about 80% water or less and has methanol as a constituent. The method further includes contacting the microelectronic substrate with a polishing pad material and electrically coupling the conductive material of the microelectronic substrate to a source of varying electrical signals via the electrolytic liquids and the at least one electrode. The method still further includes applying a

varying electrical signal to the conductive material and moving at least one of the polishing pad material and the microelectronic substrate relative to the other. The method yet further includes removing at least a portion of the conductive material from the microelectronic substrate while the electrolytic liquid is adjacent to the electrically conductive material.

Emesh discloses an electrical chemical planarization apparatus that selectively removes metal layers at high topography areas to achieve enhanced planarization (Emish at Abstract and column 3, lines 21-27). The apparatus utilizes special electrolytic planarizing solutions that may include concentrated mineral acids, salts, or methanol (Emish at column 5, lines 38-52). In particular, Emesh's solutions may include a film-forming agent, which acts to protect the low topography areas from electrochemical etching by forming a soft surface film (Emesh at column 10, lines 12-19).

Emesh cannot form the basis of a Section 102 rejection of claim 11 because Emesh fails to teach or suggest each and every feature of claim 11. For example, Emesh does not teach or suggest that "the electrolytic liquid having about 80% water or less . . ." Instead, Emesh discloses that a conventional electrolytic liquid can be used and can contain methanol as an additive. However, Emesh is silent regarding the concentration of water in the disclosed electrolytic liquid. As a result, Emesh fails to teach or suggest at least one feature of claim 11. Accordingly, the Section 102(b) rejection of claim 11 should be withdrawn.

### C. Conclusion

In view of the forgoing, the claims pending in the application patentably define over the applied references. A Notice of Allowance is, therefore, respectfully requested. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned representative at (206) 359-6038.

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Respectfully submitted,

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